

Office of the Secretary
Federal Communications Commission
Washington, DC 20554

PR Docket 93-305
FCC Docket 93-545
Released December 29, 1993

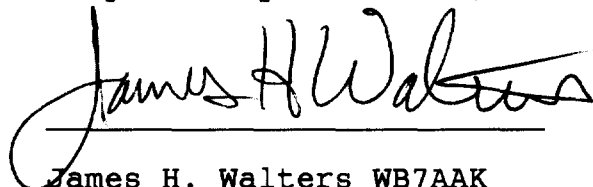
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In the Matter of

Notice of Proposed Rule Making Concerning
Amendment of the Amateur Service
Rules to Implement a Vanity Call
Sign System.

Transmitted herewith are the original comments of the
Portland (Oregon) Amateur Radio Club plus nine copies.

Respectfully submitted,



James H. Walters WB7AAK
Chair, Legal Affairs Committee
Portland Amateur Radio Club
c/o Ron Mayer K7BT
6115 SE 13th Avenue
Portland, Oregon 97202-5329

3JHW
March 4, 1994

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Before the Federal Communications Commission

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Comments of the Portland Amateur Radio Club

The Portland Amateur Radio Club (hereinafter PARC) is located in Portland, Oregon and has a membership drawn from the metropolitan Portland area.

Allowing Selection of Vanity Call Signs is Worthwhile

PARC believes that implementation of a vanity call sign system is a worthwhile goal.

Vanity Call System as Proposed Raises Concerns
When Applied to Club and Military Recreation Stations

In the notice of proposed rule making, the Commission suggests a fee of \$7.00 per year for maintaining a club or military recreation station call sign. Since amateur service licenses are currently valid for a period of ten years, such a fee level would require an advance payment of \$70.00. Paying the sum of \$70.00, especially in the case of rural area club stations and school club stations, can be a great burden. In the case of school club stations, for example, such a payment could lead to the abandonment of school club stations. School funds are severely

limited in many areas of the country and in Oregon in particular, property tax limitation has reduced school funding to an extent that has resulted in elimination of school extracurricular activities (e.g. music programs, sports programs, etc). To impose a fee of \$70.00 on organizations that are so underfunded could have the effect of eliminating school club stations, or rural club stations. Club stations in schools and rural areas are important to the vitality of amateur radio, and PARC believes the Commission's rules should promote the existence of such clubs. PARC fears that the imposition of a \$70.00 fee would work against the existence of such clubs.

Make School Club Stations Exempt from Fees

PARC respectfully urges that the Commission adopt rules that would exempt schools, public or private, from paying any fees for receiving call signs, vanity or otherwise.

Issue Club Calls Out of Special Club Block Without Fee

PARC suggests modification of the rules to allow club and military recreation station call signs be issued out of a special block reserved for club call signs, on a non-vanity basis, for no fee or for a one time fee.

Allow Club Vanity Calls Upon Payment of a Fee

PARC further suggest that rules be promulgated such that if a club desires to select a specific call (vanity call), then the club should be required to pay such fees as applicable to other

amateur radio operators under the vanity call system as proposed by the Commission in the notice of proposed rule making.

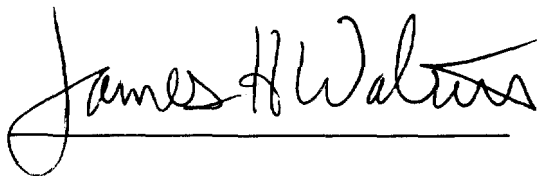
Existing Clubs Should be Grandfathered

PARC respectfully requests that the Commission adopt rules that would allow existing club and military recreational stations to retain their present call signs without payment of any fees.

Conclusion

To summarize, PARC suggests that a vanity call sign system be implemented that: 1) exempts school club stations from payment of call sign fees; 2) allows club and military recreation stations to receive non-vanity calls for no fee; 3) allows club and military recreation stations to select vanity calls upon payment of a fee in accordance with the system as proposed by the Commission in the notice of proposed rule making; and 4) allows existing club and military recreation stations to retain current calls at no fee.

Respectfully Submitted,

A handwritten signature in cursive script, reading "James H. Walters". The signature is written in dark ink and is positioned above a horizontal line.

James H. Walters WB7AAK
Chair, Legal Affairs Committee
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